

IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Geneva Reed-Veal, Individually )  
& as Mother and Personal )  
Representative of the Estate of )  
Sandra Bland, deceased., )  
 )  
Plaintiffs, )  
 )  
v. ) No. 4:15-cv-02232  
 ) Judge David Hittner  
Brian Encinia, Et al., )  
 )  
Defendants. )

**NOTICE OF OPPOSED MOTION**

**TO: SEE ATTACHED SERVICE LIST**

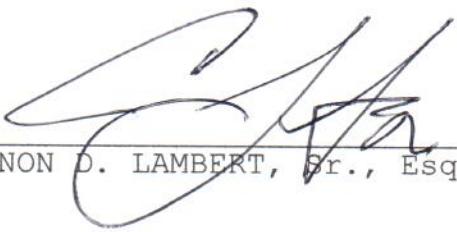
On August 4, 2016, I shall file the attached: **EXHIBIT 1 TO PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER FILED ON JULY 28, 2016 SEEKING A GAG ORDER** with the U.S. District Court, Southern District of Texas Houston Division.

Name: KARCHMAR & LAMBERT, P.C. Attorney for Plaintiff  
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**PROOF OF SERVICE BY MAIL**

I, the undersigned, certify that I served this notice by mailing a copy to the above-named party(ies) at the above-stated address(es) and depositing the same in the U.S. Mail at 211 W. Wacker Chicago IL. at or before 5:30 p.m. on August 4, 2016, with proper postage prepaid.

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**SERVICE LIST**

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## **EXHIBIT 1**

# THE WALL STREET JOURNAL.

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<http://www.wsj.com/articles/sandra-bland-case-in-texas-renews-scrutiny-of-jail-suicides-1437690298>

U.S.

## Sandra Bland Case in Texas Renews Scrutiny of Jail Suicides

Suicide rate in jails has fallen sharply in past decade but still three times the rate in general population, data show

By **DAN FROSCH** and **ANA CAMPOY**

July 23, 2015 6:24 p.m. ET

The case of Sandra Bland, the black woman found dead in a Texas cell this month after she was arrested following a traffic stop, has brought renewed attention to the issue of suicides in U.S. jails.

Suicides remain the second most common cause of death in jails after illness—ahead of accidents and homicides—although the suicide rate in jails has dropped sharply over the past decade.

In 2012, the rate was 40 suicides per 100,000 jail inmates, down 17% since 2000, according to a report from the federal Bureau of Justice Statistics released in October. The number of suicides has held fairly steady—with 300 suicide deaths in 2012 and 289 in 2000—but the rate has declined as the overall jail population has risen.

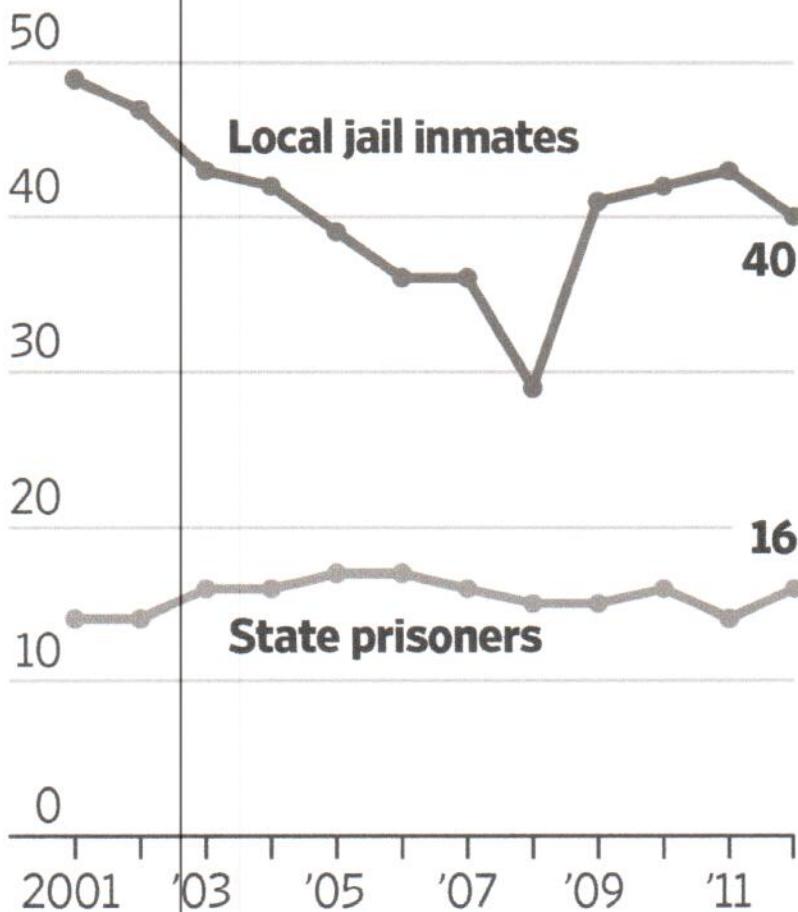
Despite the drop, local detention facilities still struggle with preventing prisoners from taking their own lives due to a high-risk inmate population, lack of mental-health resources and other factors, experts said. And the suicide rate in jails is roughly three times the rate in the general population, federal data shows.

“You’re dealing with a population that has a disproportionate number of people who are

Sandra Bland Case in Texas Renews Scrutiny of Jail Suicides - WSJ  
mentally ill, and a disproportionate number of people who are using drugs and alcohol because they have come straight from the streets," said Christine Tartaro, a criminal justice professor at Stockton University in New Jersey.

## Behind Bars

Mortality rate by suicide per 100,000 inmates

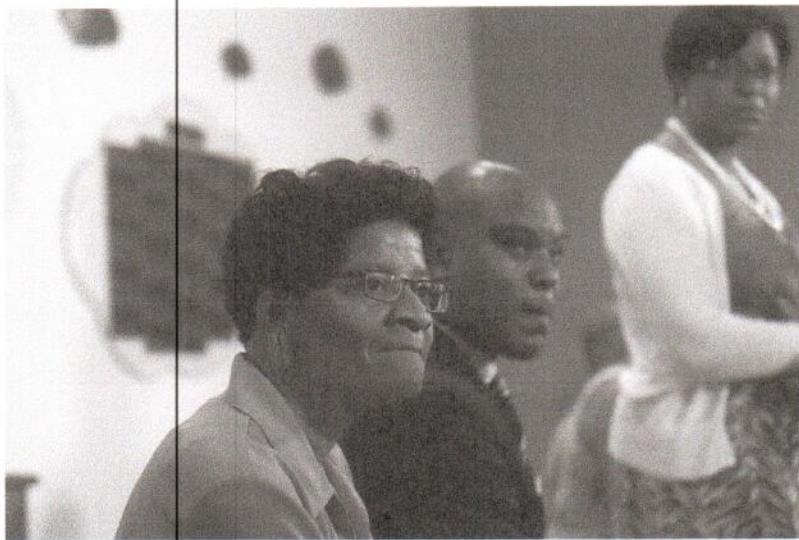


Source: Bureau of Justice Statistics

THE WALL STREET JOURNAL.

Authorities initially ruled Ms. Bland's death a suicide, saying she appeared to have hanged herself July 13, three days after being arrested by a Texas highway patrol trooper. A Waller County, Texas, prosecutor reiterated that Thursday, saying pathological and toxicological tests performed on Ms. Bland point to a likely death by suicide.

Family and friends have questioned the official account of her death, saying Ms. Bland, 28 years old, was in good spirits and excited about the prospect of starting a new job at her alma mater, Prairie View A&M University. Her family is pursuing an independent autopsy.



Sandra Bland's mother, left, attends a news conference with a family lawyer, center, in Illinois this week. PHOTO: JOSHUA LOTT/GETTY IMAGES

The Bureau of Justice Statistics report shows the suicide rate in local jails was more than double that in state prisons in 2012, the most recent year analyzed by the federal agency. The report didn't examine federal prisons.

Researchers say suicides are more common in local jails than in state prisons because inmates are constantly being shuffled in and out of facilities and staff tends to be less familiar with the jailed population.

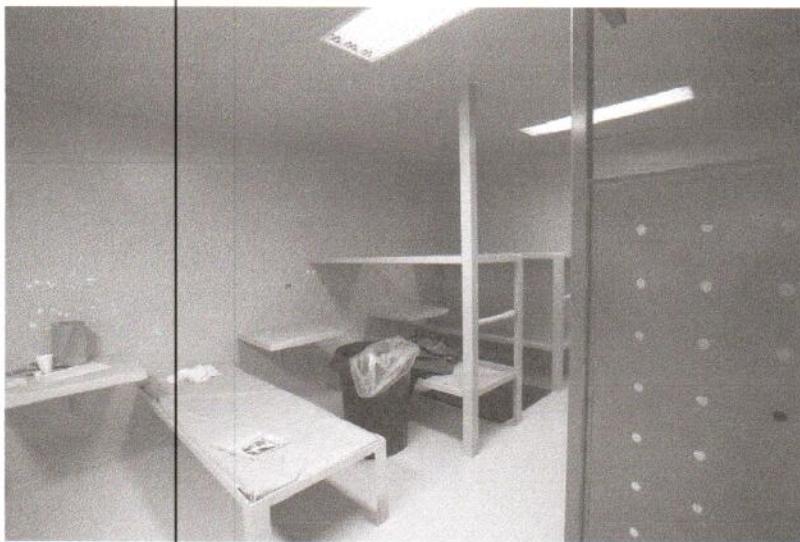
Booking records from the Waller County jail released Wednesday state that Ms. Bland reported an earlier suicide attempt this year after she lost a baby but wasn't deemed to be a suicide risk at the jail.

Ms. Bland's death, as well as her arrest and treatment in jail, is being investigated by Texas authorities. A probe last week by the Texas Commission on Jail Standards found that jail staff failed to check on inmates at least once an hour, as required by its policies.

The commission has been mandated to closely track jail suicides since 2009 at the bequest of lawmakers seeking to more systematically identify problematic jails. So far, the agency has recorded around 140 suicides, including Ms. Bland's.

Daniel Dillon, a researcher at the University of Texas who has studied the state's jails, said that Ms. Bland's death simultaneously fit and contradicted the profile of inmates who killed themselves, underscoring how complicated the issue can be.

In a study of Texas jails published in 2013, Mr. Dillon found that most inmates who killed themselves were white men, and many were violent offenders facing multiple charges. At the same time, the study found most suicides happened relatively soon after an inmate was booked and tended to occur by hanging or strangulation.



The Waller County jail cell where Ms. Bland was found dead. *PHOTO: PAT SULLIVAN/ASSOCIATED PRESS*

“These risk factors don’t really capture the whole picture of an inmate’s history, which is what makes suicides so hard to predict,” he said.

In Alabama, a similar case to Ms. Bland’s is drawing scrutiny from activist groups. Kindra Chapman, an 18-year-old African-American woman, appears to have hanged herself on July 14 with a bed sheet shortly after she was booked at the Homewood City Jail, outside Birmingham.

Ms. Chapman, who was charged with robbery for stealing a cellphone, later died at a hospital, said Jefferson County’s Chief Deputy Coroner Bill Yates.

Jefferson County District Attorney Brandon Falls said that after reviewing all the evidence submitted to his office, including video of Ms. Chapman in her cell, he believes she committed suicide.

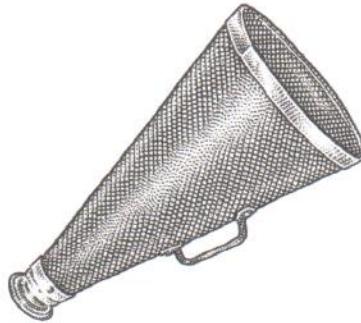
Ms. Chapman’s family and friends dispute the notion that she might have taken her own life. At a rally this week in which protesters wore bed sheets around their necks, Leslie Chapman, Ms. Chapman’s aunt, told a local TV reporter that her niece had “everything to live for.”

*—Nathan Koppel contributed to this article.*

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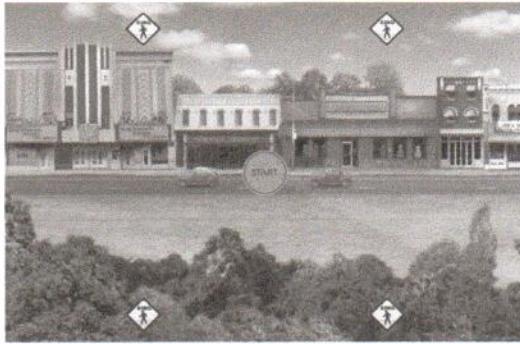
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